

Assigned AUSA: JAG

County: Lincoln

Re: Warrant for arrest of:

KARALYN SOLIS and LEORA GUERY which are incorporated herein by this reference.

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
FEB 20 2020
SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON DEPUTY

AFFIDAVIT

STATE OF WASHINGTON)

:ss

County of Spokane)

Shannon K. Saylor, being first duly sworn on oath, deposes and states:

1. I am a Postal Inspector with the United States Postal Inspection Service and have been so employed since July 2006. I am a graduate of the United States Postal Inspection Service Training Academy in Potomac, Maryland. Routine duties of your affiant include the investigation of violations of federal laws pertaining to financial crimes against the United States, to include access devise fraud, fictitious obligations, identity theft and theft of the United States Mail. I am a member of the Spokane Financial Crimes Force. The following information is known to your affiant personally, or was reported to your affiant by witnesses with personal knowledge of the criminal act.

2. In conjunction with my official duties, your affiant has conducted an investigation into the theft and receipt of stolen mail matter by KARALYN SOLIS and LEORA GUERY and, as set forth herein, asserts there is probable cause to believe that KARALYN SOLIS and LEORA GUERY have committed the crimes

of theft, receipt, and possession of stolen mail matter, in violation of 18 U.S.C. § 1708.

3. In relevant part, 18 U.S.C. § 1708 prohibits:

- a. The theft of mail from authorized mail depositories. Authorized mail depositories are defined to include residential mailboxes;
- b. The removal of any article or thing contained in any item of mail which had been stolen or taken from an authorized mail depository; and,
- c. The receipt and possession of stolen mail and anything contained in the stolen mail.

4. On or about February 17, 2020, Lincoln County Sheriff's Office Deputy Jerad McLagan contacted your affiant and advised that he was investigating a large multi victim mail theft case involving more than 500 pieces of mail stolen from 18 different cities in Eastern Washington. Deputy McLagan further advised your affiant of the following events:

5. Deputy McLagan advised your affiant that on February 11, 2020 at 1400 hours, Davenport citizen, Jasper Eaton, called the Lincoln County Sheriff's Office and reported a red Ford Edge, Washington license BRD2978 was seen going from mailbox to mailbox in the area of 38300 Woodlawn Ln. Davenport, Washington 99122. Deputy McLagan advised that Lincoln County Sheriff's Office dispatch had received multiple calls that day regarding mailboxes left open and missing mail. Deputy McLagan told your affiant that he responded to the area of 38300 Woodland Ln. in Davenport, Washington on February 11, 2020 in an attempt to locate the red Ford Edge and was notified over the radio that Deputy Cuzzetto had stopped the vehicle traveling southbound on State Route 25 at 1411 hours. Deputy McLagan advised your affiant that KARALYN SOLIS ("SOLIS") was identified as the driver and LEORA GUERY ("GUERY") was identified as

the passenger. Deputy McLagan then contacted SOLIS in the vehicle and could see envelopes and credit cards near the center console.

6. Deputy McLagan told your affiant that on February 11, 2020 he advised SOLIS of her constitutional rights from a pre-printed rights card, which she waived verbally. Deputy McLagan advised your affiant that SOLIS then told Deputy McLagan the following: GUERY picked her up in the early morning hours on February 11, 2020 and they were driving to Spokane to look for a new vehicle. SOLIS stated she fell asleep quickly in the car and woke up in Coulee City. SOLIS stated that while in Coulee City, GUERY asked her to drive and pulled over near a stand of mailboxes. SOLIS stated that GUERY then began taking all of the mail from the stand of mailboxes. SOLIS stated that she knew GUERY was down on her luck and having money issues. SOLIS stated that they never discussed stealing mail but she went with it and while driving she began looking for mailboxes in groups of five (5) or more to steal mail from. SOLIS stated that they kept some of the mail in the car and threw the rest out the window.

7. Deputy McLagan advised your affiant that SOLIS was searched incident to arrest and located on her person was a debit card in the name of Steven Harrington.

8. Deputy McLagan advised your affiant that he contacted Leora GUERY and advised her of her constitutional rights from a pre-printed rights card, which she waived verbally. GUERY told Deputy McLagan the following: She (GUERY) and SOLIS were driving to Spokane and they were passing out magazines at mailboxes. GUERY stated that she did not know who the magazines came from, where they were at in the vehicle and advised she does not get paid for passing out magazines.

9. Deputy McLagan advised your affiant that GUERY was searched incident to arrest and in her pocket were two white pills identified as

Acetaminophen and Hydrocodone Bitartrate 325 mg and a check made payable to Lakeview Terrace RV Park from Nicholas Kempf. Deputy McLagan advised your affiant that he called Ida Dice, the manager of Lakeview Terrace RV Park and she stated that she was expecting a check from Kempf in the mail and had not received it. Dice advised that neither SOLIS nor GUERY had permission to possess the Lakeview Terrace RV Park's mail.

10. Deputy McLagan advised your affiant that on February 11, 2020, he applied for a Lincoln County Superior Court Search Warrant to search the 2010 red Ford Edge, Washington license BRD2978 for evidence of Mail Theft, Possession of a Controlled Substance and Possession of Another's Identification. Deputy McLagan advised your affiant that the following items were seized from the vehicle: 592 pieces of suspected stolen mail from 18 different cities; three checkbooks; three gift cards; 11 checks; 43 debit and or credit cards; eight Driver's Licenses and or Identification Cards; two United States Passports and 1.23 grams of suspected methamphetamine.

11. On February 18, 2020, your affiant responded to the Lincoln County Sheriff's Office and reviewed the evidence collected from the vehicle search warrant to include United States Mail addressed to Mary L. Carl, 306 N. Georgia Ave Apt. 2, East Wenatchee, WA 98802; Ron Peasley, 3574 Highway 155, Coulee Dam, WA 99116 and Kevin Roe, 456 S. Lyle Ave., East Wenatchee, WA 98802. Your affiant contacted Carl, Peasley and Roe and confirmed that their United States Mail is delivered to rural style mailboxes in Eastern, Washington. Your affiant confirmed with Carl, Peasley and Roe that Karalyn SOLIS and Leora GUERY did not have permission to possess their United States Mail.

12. Based on the foregoing facts and evidence, your affiant submits that probable cause exists to believe that Karalyn SOLIS and Leora GUERY, did knowingly and with intent, unlawfully have in their possession United States Mail,

to include letters, post cards, packages, bags, or mail, or any article or thing contained therein, which has been stolen, taken, embezzled, or abstracted, as herein described, knowing the same materials to have been stolen, taken, embezzled, or abstracted, all in violation of 18 U.S.C. § 1708.

13. Based on these facts, your affiant requests the Court issue warrants for the arrest of Karalyn SOLIS, a female with a date of birth in May 1984 and Leora GUERY, a female with a date of birth in July 1982, charging them both with Theft, Receipt and Possession of Stolen Mail Matter in violation of 18 U.S.C. § 1708.


Shannon K. Saylor
United States Postal Inspector

SUBSCRIBED and SWORN before me this 20th day of February, 2020.


JOHN T. RODGERS
United States Magistrate Judge